UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

United States of America,

Case No. 23-cr-82(NEB/TNL)

Plaintiff,

v.

MOTION TO EXTEND TIME FOR SELF SURRENDER

Sharon Ross,

Defendant.

The Defendant, Sharon Ross, through her counsel, hereby moves the Court for an extension of time to self-surrender from April 24, 2025, to August 24, 2025.

The Defendant pleaded guilty on January 10, 2024. The Defendant was sentenced to 43 months imprisonment on February 7, 2025. The Court ordered that Ms. Ross self-surrender on March 25, 2025. Ms. Ross filed a Motion to Extend Self Surrender on February 20, 2025, the motion was partially granted, and her surrender date was extended to April 24, 2025.

Ms. Ross now needs additional time to get her affairs in order due to unforeseen circumstances, specifically the following:

- 1. Ms. Ross's father passed away unexpectedly on March 8, 2025. Since that time Ms. Ross has overseen and planned all funeral arrangements. She is now awaiting autopsy results as there was some suspected negligence surrounding the death. She is closely involved with these issues and will have follow-up once results are received.
- 2. The Court was previously made aware of Ms. Ross' baby/toddler grandchildren whom she has cared for over the last couple of years. Since sentencing, Ms. Ross has taken her three grandchildren, whom she has been the primary caretaker for, to Mississippi to be with their

mother (Ms. Ross' daughter), as she will not be able to care for them while she is away. The daughter is in an unstable marriage and the children are not safe. They are not getting the proper care needed while under the supervision of the daughter and her husband, one child was recently rushed to the hospital. Therefore, new arrangements need to be made for the small children, which includes getting them back to Minnesota and finding alternative care.

Ms. Ross has been in contact with probation regarding travel to arrange for this to happen.

3. As outlined in the previous Motion to Extend Self Surrender, Ms. Ross is still working on housing for her elderly mother, mother-in-law, and husband. They are still awaiting answers on what will happen with their home that has been forfeited yet they are still living in. This is taking longer than expected to get answers and arrange future living accommodations.

Based on the foregoing, Ms. Ross requests an extension of her self-surrender date to August 24, 2025.

Respectfully Submitted,

Dated this 3^{rd} day of April, 2025.

s/Earl P. Gray

Earl P. Gray #37072 Attorney for Defendant First National Bank Building 332 Minnesota Street Suite W1610 St. Paul, MN 55101 651-223-5175